<div style="text-align: center;"><u>REMARKS</u></div>

Claims 1-19 are pending. Claims 20-40 are cancelled.

Claims 1-14, 16, 20-34, 36, and 40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Singhal (U.S. Patent No. 6,938,022) ("Singhal") in view of Cornelius et al. (US Patent 7,069,234). Claims 15 and 35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Singhal and Cornelius and further in view of Benjamin et al. (U.S. Patent No. 7,010,572) ("Benjamin"). Claims 17-19 and 37-39 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Singhal and Cornelius and further in view of Admission.

Rejection of Claims 1-14, 16, 20-34, 36, and 40 under 35 U.S.C. § 103(a) - Singhal in view of Cornelius

With respect to claims 1-14 and 16, this rejection is respectfully traversed. Independent claim 1 is set forth below:

> 1. (Previously Amended) A method for providing a secure response to a first party, comprising the steps of:
> receiving a first submission from the first party over a communications network, wherein the first submission is directed to a second party and includes an identifier associated with the first submission, and wherein the first party is not authenticated or registered with the second party;
> **receiving a response to the first submission from the second party;**
> **storing the response for later retrieval by the first party or the second party;**
> **sending a notification to the first party, wherein the notification provides information for securely accessing the response;**
> **receiving a second submission from the first party wherein the second submission comprises information for correlation to the identifier provided in the first submission;**
> authenticating the first party; and
> permitting the first party to securely access the response from the second party.

As pointed out by the Examiner, Singhal does not disclose that "the first party is not authenticated or registered with the second party." This is a critical limitation. As is the case with the current claims, the processes described in Singhal are not necessarily directed to a novel aspect of the initial communication between the first (user or merchant) and second (information system) party, but instead focus on the processes that are available to all parties (users and

merchants) subscribing to the information system. Accordingly, Singhal simply does not disclose at least the claim limitations highlighted above.

The Office points to two sections of Singhal as teaching the steps highlighted as missing. The undersigned has set forth these section explicitly below. Column 16, lines 50-67:

> The information system 12 sends the requested non-identifying data 324 to the merchant 22. The merchant 22 receives the non-identifying data 324 from the information system 12 via the merchant interface 22A. The merchant 22 can use the non-identifying data 324 to provide an estimate for a service and/or provide the service. Next, the merchant 22 sends the results to the information system 12.

> The Information system 12 receives the service results and forwards the service results to the customer 20. More specifically, the information system 12 uses the sequence number 330 to retrieve the electronic mail address of the customer 20. After retrieving the electronic mail address, the results are forwarded to the customer 20 via the customer interface 20A using the electronic mail address of the customer 20. Alternatively the results may be forwarded to the customer 20 using other ways, such mail using the post office or express mail.

Col. 18, lines 10-65:

> Service Merchant Web Pages

> FIGS. 8A and 8B illustrate simplified merchant web pages of an auto insurance merchant 800 and a custom tailor merchant 802, respectively.

> The auto insurance merchant 804 may provide for an auto insurance quote form 806 that requires the customer 20 input the desired liability insurance amount 808, the desired collision/comprehensive insurance amount 810 and requires the completion of an insurance application 812 including the personal data 814 of the customer 20. The customer 20 may submit an insurance application anonymously by clicking the Apply with the Information System icon 816. On clicking of icon 816, the information system 12 can display a web page 980 similar to that illustrated in FIG. 9D. The web page 980 carries over the service merchant id 982, the data entered by the user for auto insurance quote 983 specifying liability amount 984 and collision amount 985. This web page provides a space for the entry of the Anonymous Identifier 986 and data type as auto insurance 987. On clicking Send icon 989 the information system 12 forwards the data from the information system 12 to the service merchant 22. The service merchant 22 responds with service results in the form of quote or query to the customer via merchant/customer identifier.

> After receiving multiple quotes, the customer 20 may select one quote and choose to enter into a binding relationship by contacting the service merchant 22 directly and revealing the customer identity.

FIG. 8B illustrates a simplified Web page 802 for a custom tailor merchant 820. It may provide for custom tailor service and ask for entry of fabric selection 822, item selection 824, design/style selection 826 and ask for personal data 828 in the form of identifying data, body dimension data and payment data. A customer may receive custom tailor service anonymously by clicking Apply with information system icon 830.

Upon clicking of icon 830, the information system 12 displays a web page 990 as shown in FIG. 9E. The web page 990 carries over the service merchant id 991, the data entered by the user 20 for custom tailor service fabric 993, style 994 and item 995. The web page 990 provides a space for the entry of the anonymous identifier 996, data type as body 997 and payment type 998. On clicking Send button 999, the information system 12 forwards the user data from the information system 12 to the service merchant 22. The service merchant 22 responds with service results in the form of delivery of the custom tailor item to the customer via merchant/customer identifier.

Unfortunately, these sections of the specification only arguably cover part of the claim limitations and are unrelated to other parts of the specification that the Office has cited as teaching the remaining limitations. The claims follow a process and interactions between only two parties, i.e., first and second parties. The parties are not interchangeable. So, for example, the Office cites to the Abstract as disclosing the initial limitations directed to:

> providing a secure response to a first party, comprising the steps of:
> receiving a first submission from the first party over a communications network, wherein the first submission is directed to a second party and includes an identifier associated with the first submission, and wherein the first party is not authenticated or registered with the second party;

The Abstract states:

> An information system (12) for storing personal information of a customer (20) is provided herein. The customer (20) preferably communicates with the information system (12) using the Internet. Further, the customer (20) preferably uses an anonymous identifier (320) to gain access to the information system (12). The customer (20) can create the anonymous identifier (320) to assure anonymity and to facilitate anonymous and secure transactions over the Internet. Some or all of the personal information of the customer (20) is preferably electronically shredded and defaced before storage in the information system (12). This feature allows the customer (20) to maintain private data (25) in the information system (12) anonymously and shields the private data (25) from even the operators of the information system (12). In addition to maintaining the private data (25), the

information system (12) allows the customer (20) to anonymously receive an
estimate on a service and/or receive a service (806) from the service merchant
(22) without the merchant (22) knowing the identity of the customer (20).
Examples of services (806) that may be received from service merchants (22)
include an insurance quote for a vehicle, an insurance quote for a structure, a life
insurance quote, a health insurance quote, an insurance quote on some other item,
a one time use of special software such as tax computation software, a quote on a
loan, interest rates for a loan application, and clothing that is custom tailored.

Since the Office has failed to explicitly point out the claim language within the Abstract, the
undersigned will attempt to do so. A reading of the Abstract would suggest that:

- the first party = the customer
- the second party = the information system
- the first submission = personal information of the customer
- an identifier = the anonymous identifier

Now, for the **highlighted** limitations, the Office skips to near the end of the specification and
points to sections wherein the primary parties who are interacting are the merchant (a third party)
and the information system (the second party). The claims are directed to interactions between
the first party and the second party, there is no third party.

If, for arguments sake, we switch the nomenclature and we assume that the customer is
still the first party, but the merchant is the second party (instead of the information system), the
Office still faces the same problem. The parties are not interchangeable. The process steps
require specific interactions in a particular order between only two parties.

Cornelius does not cure the deficiencies of Singhal. The Office cites Cornelius as
teaching the limitation wherein the first party is not authenticated or registered with the second
party. More specifically, the Office admits that the processes of Singhal and Cornelius require
the interaction of three parties stating:

Therefore, it would have been obvious to one having ordinary skill in the art at
the time the invention was made to provide a third party interposed between the first
and second party as taught by Cornelius with the system of Singhal. One of ordinary
skill in the art would have been motivated to perform such a modification to preserve
first party's privacy (Cornelius, col. 191, lines 20-55).

Referring back to the language of claim 1, this is simply not what is claimed. The claimed process is a two party process, not a three party process. In fact, a reduction in the number of required parties is an important consequence of the invention.

The undersigned respectfully submits that claims 1-19 are patentable over the cited art for the reasons stated above.

Rejection of Claims 15 and 35 under 35 U.S.C. § 103(a)

Claims 15 and 35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Singhal and Cornelius and further in view of Benjamin et al. (U.S. Patent No. 7,010,572) ("Benjamin"). For at least the reasons set forth above with respect to claim 1, Singhal and Benjamin do not establish a prima facie case of obviousness with respect to claims 1, 20, and 40 because Singhal fails to disclose each and every element of the independent claims. Benjamin fails to cure the deficiencies of Singhal. Therefore, the undersigned representative respectfully requests that the Examiner withdraw the rejection of claim 15.

Rejection of Claims 17-19 and 37-39 under 35 U.S.C. § 103(a)

Claims 17-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Singhal and Cornelius and further in view of Admission. For at least the reasons set forth above with respect to claim 1, Singhal does not establish a prima facie case of obviousness with respect to claims 17-19 because Singhal fails to disclose each and every element of the independent claims. Therefore, the undersigned representative respectfully requests that the Examiner withdraw the rejection of claims 17-19.

CONCLUSION

The undersigned representative respectfully submits that this application is in condition for allowance, and such disposition is earnestly solicited. If the Examiner believes that the prosecution might be advanced by discussing the application with the undersigned representative, in person or over the telephone, we welcome the opportunity to do so. In addition, if any additional fees are required in connection with the filling of this response, the Commissioner is hereby authorized to charge the same to Deposit Account 110980.

Respectfully submitted,

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